REMARKS/ARGUMENTS

Prior to the entry of this Amendment, claims 1-48 were pending in this Application. No claims have been amended, no claims have been added, and no claims have been canceled herein. Therefore claims 1-48 remain pending in this application. Applicant respectfully requests reconsideration of these claims for at least the reasons presented below.

35 U.S.C. § 103 Rejection, Boltz in view of Purpura

The Office Action has rejected claims 1-48 under 35 U.S.C. § 103(a) as being unpatentable over U. S. Patent No. 6,981,043 B2 of Botz et al. (hereinafter Botz") in view of U. S. Patent No. 6,421,768 B1 of Purpura et al. (hereinafter "Purpura"). The Applicant respectfully submits that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicant requests reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP § 706.02(j). However, as will be discussed below, the references cited by the Office Action do not teach or suggest each claimed limitation. For example, neither reference, alone or in combination, teaches or suggests authorizing a first user to access a system or resource as a second user.

Botz relates to "an apparatus and method allow a system administrator to manage multiple user identities in multiple user registries in different processing environments." (Col. 2, lines 12-15) Under Botz "an identity mapping mechanism is provided that includes a directory

service that includes entries that reference user identities in the multiple registries, and that

reference identity mappings between those entries." (Col. 2, lines 15-19) That is, Botz teaches

identifying a user's accounts on different systems. Specifically, Botz "provides the infrastructure

for correlating multiple user identities in these different environments **to a single user**." (Col. 5,

lines 47-50) For example, "a user may enter security information for one local user identity, and

an operating system or application may use the identity mapping mechanism of [Botz] to

determine corresponding security information on a different platform or application." (Col. 5,

lines 55-60)

However, Botz does not teach or suggest authorizing a first user to access a

system or resource as a second user. To show support for the argument that Botz does in fact

teach such "impersonation," the Office Action cites col. 12, lines 1-14 of Botz. This paragraph

states, in it entirety:

> "One significant advantage of the present invention is that the security semantics
> for each environment are maintained, yet the security information for one
> environment may be mapped to equivalent security information in a different
> environment. This capability avoids the need for a user to remember multiple
> identities and passwords for the different environments. **Once the user is
> authenticated for one environment, the identity mapping mechanism of the
> preferred embodiments can be used to find an appropriate identity in a
> different user registry that is associated with the authenticated user**, and
> impersonate the associated identity or otherwise apply the security semantics of
> the second user registry in order to access data protected by its security
> semantics." (Emphasis added)

It is clear from this paragraph, especially when read in light of the previously

cited sections of Botz, that Botz does not teach of suggest authorizing a first user to access a

system or resource as a second user. Rather, as explicitly stated in Botz and quoted above, Botz

teaches correlating multiple user identities in different environments **to a single user**.

Purpura is directed to "securely transferring user authentication information from

a first computer to one or more other computers to allow the user to interact with the other

computers without necessarily having to explicitly identify himself thereto." (Col. 1, lines 8-12 and col. 2, lines 19-22) More specifically, Purpura teaches a single sign-on method. (Col. 2, lines 23-24) "Thus, if a second computer trusts the methods used by a first computer to authenticate a user, then the second computer can use a cryptographically assured cookie created by the first computer to authenticate the user, without requiring the user to perform an explicit authentication step at the second computer." (Col. 2, lines 24-29)

That is, Purpura discloses a single sign-on method that, as is typical of single sign-on, allows a user to access a second computer system based on his access of a first computer system. In other words, under Purpura, a user can logon to or access a first system which performs any necessary authentication. The first system then issues a token, in this case, a "cryptographically assured cookie," to the user. The **same user** can then use this token to access **other systems** without re-authenticating. However, Purpura does not disclose impersonation, i.e., authorizing **a first user** to access a system or resource **as a second user**.

The combination of Botz and Purpura is no more relevant to the pending claims than either reference alone since neither reference, alone or in combination, teaches or suggests authorizing a first user to access a system or resource as a second user. Rather, Botz teaches correlating multiple user identities in different environments to a single user. Similarly, Purpura teaches allowing a user to access a system based on a token provided by another system, i.e., a single sign-on method that allows a user to access a second computer system based on his access of a first computer system. Thus, both Botz and Purpura teach allowing a particular, single user to access different systems or environments based on his access of one system or environment. However, neither reference, alone or in combination, teaches or suggests authorizing a first user to access a system or resource as a second user.

Claim 1, upon which claims 2-15 depend, claim 28, upon which claims 29-38 depend, and claim 35, upon which claims 36-38 depend, each recite in part "receiving authentication credentials for a first user and an identification of a second user; authenticating

said first user based on said authentication credentials for said first user; creating a cookie that stores an indication of said second user if said step of authenticating is performed successfully; and authorizing said first user to access a first resource as said second user based on said cookie." Neither reference, alone or in combination, teaches or suggests, authorizing a first user to access a first resource as a second user. Rather, Botz teaches correlating multiple user identities in different environments to a single user while Purpura teaches allowing a user to access a system based on a token provided by another system, i.e., single sign-on. For at least these reasons, claims 1-15, 28-38, and 35-38 should be allowed.

Claim 16, upon which claims 17-23 depend, claim 39, upon which claims 40-44 depend, and claim 45, upon which claims 46-48 depend, each recite in part "receiving authentication credentials for an impersonator and an identification of an impersonatee at an access system, wherein said access system protects a first resource that is separate from said access system; authenticating said impersonator based on said authentication credentials for said impersonator, wherein said step of authenticating is performed by said access system; and authorizing said impersonator to access said first resource as said impersonatee, wherein said step of authorizing is performed by said access system." Neither reference, alone or in combination, teaches or suggests, authorizing a first user to access a first resource as a second user. Rather, Botz teaches correlating multiple user identities in different environments to a single user while Purpura teaches allowing a user to access a system based on a token provided by another system, i.e., single sign-on. For at least these reasons, claims 16-23, and 39-48 should be allowed.

Claim 24, upon which claims 25-27 depend, recites in part "receiving authentication credentials for the first entity and an identification of the second entity at an access system, wherein said access system protects a plurality of resources; receiving an indication of one or more of said plurality of resources; authenticating said first entity based on said authentication credentials for said first entity, wherein said step of authenticating is performed by said access system; and authorizing said first entity to access said one or more of

said plurality of resources as said second entity, wherein said step of authorizing is performed by said access system." Neither reference, alone or in combination, teaches or suggests, authorizing a first user to access a first resource as a second user. Rather, Botz teaches correlating multiple user identities in different environments to a single user while Purpura teaches allowing a user to access a system based on a token provided by another system, i.e., single sign-on. For at least these reasons, claims 24-27 should be allowed.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

William J. Daley
Reg. No. 52,471

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 303-571-4000 (Denver)
Fax: 303-571-4321 (Denver)

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